

IN THE MATTER OF THE GENERIC

REQUIREMENTS FOR UNBUNDLED

INVESTIGATION INTO U S WEST

ORIGINAL

A CORPORATION COMMISSION

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MARC SPITZER. **CHAIRMAN**

JIM IRVIN **COMMISSIONER**

WILLIAM A. MUNDELL **COMMISSIONER**

JEFF HATCH-MILLER COMMISSIONER

MIKE GLEASON COMMISSIONER

DISCOUNTS

DOCKET NO. T-00000A-00-0194

2003 APR 28 P 2: 51

COMMUNICATIONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING NETWORK ELEMENTS AND RESALE

NOTICE OF FILING OF **DIRECT TESTIMONY**

Arizona Corporation Commission Staff ("Staff") hereby files the Direct Testimony of William Dunkel, in the above-referenced matter.

RESPECTFULLY SUBMITTED this 28th day of April 2003.

Maureen A. Scott, Attorney Legal Division

Arizona Corporation Commission 1200 West Washington Street

Phoenix, Arizona 85007 Telephone: 602/542-6022 Facsimile: 602/542-4870

e-mail: maureenscott@cc.state.az.us

Arizona Corporation Commission DOCKETED

APR 3 8 2003



The ORIGINAL and ten (10) copies of the foregoing were filed this 28th day of April,

2003 with:

1		
1	CODIES of the foresting record models	
	COPIES of the foregoing were mailed	
2	this 28th day of April, 2003 to:	
3		
4	Jon Poston	Jeffrey W. Crockett
	Arizonans for Competition in Telephone	Jeffrey B. Guldner
5	Service	Snell & Wilmer L. L. P.
	6733 East Dale Lane	One Arizona Center
6	Cave Creek, Arizona 85331-6561	Phoenix, AZ 85004-2202
	,	,
7	Richard S. Wolters	Steve Sager
	AT&T Communications of the	McLeodUSA
8	Mountain States, Inc.	215 S. State Street, 10 th Floor
1	1875 Lawrence Street, Room 1575	Salt Lake City, Utah 84111
9	Denver, CO 80202-1847	San Lake City, Otali 84111
	Deliver, CO 60202-1647	Rex Knowles
10	Marri E. Staala	
10	Mary E. Steele	Nextlink Communications
11	Davis-Wright-Tremaine	111 East Broadway, Suite 1000
11	2600 Century Square 1505 – 4 th Avenue	Salt Lake City, Utah 84111
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		Todd C. Wiley
13	Joan Burke	GALLAGHER & KENNEDY
	Osborn Maledon, P.A.	2575 E. Camelback Road
14	2929 N. Central Avenue, 21 st Floor	Phoenix, AZ 85016-9225
	Phoenix AZ 85067-6379	
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	Gregory Kopta	MCI WORLDCOM
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	2600 Century Square	Denver, CO 80202
17	1501 Fourth Avenue	, • • • • • • • • • • • • • • • • •
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• •	555 Seventeenth Street	Sail Flailcisco, CA 94103
20		Sport C. Walrofield
20	Denver, CO 80202	Scott S. Wakefield
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	Denver, CO 80202	Timothy Peters
23		ELECTRIC LIGHTWAVE, INC.
	Timothy Berg	ELECTRIC LIGHTWAVE, INC. 4400 NE 77 th Avenue
24	Fennemore Craig, P.C.	Vancouver, WA 98668
1	3003 North Central Avenue, Suite 2600	
25	Phoenix, AZ 85012	Douglas Hsiao
	, ´	RHYTHMS LINKS, INC.
26	Michael W. Patten	6933 S. Revere Pkwy.
ļ	Roshka Heyman & DeWulf	Englewood, CO 80112
27	One Arizona Center	Diigionoou, CO 00112
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28		
20	Phoenix, AZ 85004	
	•	

1 2 3	NEW EDGE NETWORKS P.O. Box 5159 3000 Columbia House Blvd. Vancouver, WA 98668	Kevin Chapman Director-Regulatory Relations SBC Telecom, Inc. 300 Convent Street, Rm. 13-Q-40 San Antonio, TX 78205
5 4 5	Andrea Harris, Sr. Mgr. ALLEGIANCE TELECOM INC. OF AZ 2101 Webster, Suite 1580 Oakland, CA 94612	Thomas H. Campbell LEWIS & ROCA 40 N. Central Avenue Phoenix, AZ 85004
6 7 8	Megan Doberneck, Sr. Counsel Covad Communications Co. 7901 Lowry Blvd Denver, CO 80230	Brian Thomas Vice-President Regulatory-West Time Warner Telecom, Inc. 520 S.W. 6 th Avenue, Suite 300 Portland, Oregon 97204
9 10	Marti Allbright, Esq. Mpower Communications Corp. 5711 South Benton Circle Littleton, Colorado 80123	Steven J. Duffy Ridge & Isaacson P.C. 3101 N. Central Avenue, Suite 1090 Phoenix, AZ 85012-2638
11 12 13	Dennis D. Ahlers, Sr. Attorney Eschelon Telecom, Inc. 730 Second Ave. South, Ste 1200 Minneapolis, MN 55402	Curt Huttsell Electric Lightwave, Inc. 4 Triad Center, Suite 200 Salt Lake City, UT 84180
14 15	Janet Livengood, Reg. VP Z-Tel 601 S. Harbour Is. Blvd. Tampa, FL 33602	Jacqueline Manogian Mountain Telecommunications, Inc. 1430 Broadway Road, Suite A200 Tempe, AZ 86282
16 17 18	Michael B. Hazzard Kelley Drye & Warren LLP 1200 – 19 th St., NW 5 th Fl. WA DC 20036	Deborah R. Scott Associate General Counsel 2901 North Central Avenue, Suite 1660 Phoenix, AZ 85012
19 20	One Arizona Center 400 East Van Buren, Suite 800 Phoenix, AZ 85004	Robert S. Kant E. Jeffrey Walsh Greenberg, Traurig. LLP 2375 East Camelback Road, Suite 700
21	Attorneys for Alltel Communications	Phoenix, AZ 85016
22	Gregory Hoffman AT&T Telecommunications	Kimberly M. Kirby Davis Dixon Kirby LLp
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25	Delord A. Amade	
2627	Deborah A. Amaral Assistant to Maureen A. Scott	

BEFORE THE

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ARIZONA CORPORATION COMMISSION

2003 APR 28 P 2:51

IN THE MATTER OF THE GENERIC

INVESTIGATION INTO U S WEST

COMMUNICATIONS, INC.'S NKA QWEST

CORPORATION, COMPLIANCE WITH

CERTAIN WHOLESALE PRICING

REQUIREMENTS FOR UNBUNDLED

NETWORK ELEMENTS AND RESALE

DISCOUNTS

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AZ SARY GOMMONICATIONS

DOCKET NO. T-000000A-00-0194

DOCKET NO. T-000000A-00-0194

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NETWORK ELEMENTS AND RESALE

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DISCOUNTS

DIRECT TESTIMONY AND SCHEDULES

OF

WILLIAM DUNKEL

ON BEHALF OF

THE STAFF OF THE ARIZONA CORPORATION COMMISSION

APRIL 28, 2003

Arizona Corporation Commission DOCKETED

APR 28 2003

DOCKETED BY

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1 2 3		I. STATEME	NT OF QUALIFICATION	S AND INTRODUCTION
4 5	Q.	PLEASE STATE YOU	JR NAME AND YOUR BU	SINESS ADDRESS.
6 7	A.	My name is William D	unkel. My business address	is 8625 Farmington Cemetery Road,
8		Pleasant Plains, Illinois	s 62677.	
9				
10	Q.	WHAT IS YOUR PRE	SENT OCCUPATION?	
11	Α.	I am a consultant provi	ding services in telephone ra	te proceedings. I am the principal of
12		William Dunkel and A	ssociates, which was establis	shed in 1980. Since that time, I have
13		regularly provided cons	sulting services in telephone	regulatory proceedings throughout
14		the country. I have par	ticipated in over 140 state re	egulatory proceedings before over one-
15		half of the state commi	ssions in the United States, a	as shown on Appendix A attached
16		hereto. I have participated in telephone regulatory proceedings for over 20 years.		
17				
18		I currently provide, or	in the past have provided, se	rvices in telecommunications
19		proceedings to the follo	owing clients:	
20				
21 22		The Pub	olic Utility Commission or th	ne Staffs in the States of:
23			Arkansas	Missouri
24			Arizona	New Mexico
25]	Delaware	U.S. Virgin Islands
26			Georgia	Utah
27			Guam	Virginia
28			Illinois	Washington
29			Maryland	Kansas
30]	Mississippi	
31			* 0.1 To 1.1	
32		The Off	ace of the Public Advocate,	or its equivalent, in the States of:

1 2 3 4 5 6 7 8 9 10 11 12		The Dep	Colorado District of Columbia Georgia Hawaii Illinois Indiana Iowa Maine Florida partment of Administration i	
13 14 15			Illinois Minnesota	South Dakota Wisconsin
16				
17	Q.	ON WHOSE BEHALF	F ARE YOU TESTIFYING?	
18	A.	I am testifying on behalf of the Staff of the Arizona Corporation Commission (ACC).		
19				
20	Q.		USLY PARTICIPATED IN	ANY PROCEEDINGS IN
21		ARIZONA?		
22	A.	Yes. Most recently, I fi	iled testimony on behalf of the	ne ACC Staff in Phase IIa of this
23		proceeding, Docket No. T-00000A-00-0194. In addition, I filed testimony on behalf of		
24		the ACC Staff in Phase	e II of this proceeding. I also	o filed testimony on behalf of the
25		ACC Staff in the gener	al rate case, Docket No. T-0	1051B-99-0105. I also filed rebuttal
26		testimony in Docket No	o. T-01051B-97-0689 on bel	nalf of the ACC Staff regarding
27		depreciation. In addition	on, I conducted a Cost of Ser	rvice Study on behalf of the Staff of
28		the Arizona Corporation	on Commission in an undock	eted matter preparing a cost study
29		pertaining to Qwest Co	orporation (formerly US Wes	t Communications (USWC)). I was a
30		rate design witness in g	general rate case, Docket No.	. E-1051-93-183, involving USWC on
31		behalf of the ACC Staf	ff.	
32				

1	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
2	A.	The purpose of this testimony is to address the issues set forth in the Commission's April
3		11, 2003 Procedural Order in this proceeding.
4 5		
6	Q.	WHAT IS THE FIRST ISSUE PRESENTED IN THE PROCEDURAL ORDER?
7	A.	The first issue is:
8 9 10 11 12 13		Should Staff's Opinion 1 (the transport rates prior to this Cost Docket) or Staff's Option 2 (the transport rates adopted in Decision No. 64922 minus the entrance facility charges where no entrance facility is provided) be adopted as the rates for DS1 and DS3 transport effective until the reconsideration of these rates in Phase III of the Cost Docket?
14	Q.	WHAT IS YOUR POSITION ON ISSUE 1?
15	A.	Since I was involved in authoring both of these options, I believe either one of them
16		would be a reasonable interim solution. Of the two, I prefer Staff Option 1, which is to
17		return to the transport rates that were in effect prior to Phase II. Those prior rates had
18		previously been approved by the Commission. However, since I also presented Option 2
19		as an acceptable interim solution, I do not have a strong objection to Option 2 being the
20		interim solution.
21		
22	Q.	WHAT IS THE SECOND ISSUE SET FORTH IN THE ORDER?
23	A.	The second issue is:
24 25 26 27		Are the revised rates that are determined as a result of the expedited hearing effective as of June 12, 2002 or from the effective date of the Order adopting the revised rates?

Q. WHAT IS YOUR POSITION ON ISSUE 2?

2 A. The issue of retroactive rates is a legal issue, which I will not address.

However, as a result a recent discovery, we have determined that the application and costs of the transport rates are different than what was incorporated into the Phase II rates.

Prior to Phase II, Qwest charged a separate "entrance facility" rate and separate "transport" charges. In Phase II, these two rates were replaced with one "transport" charge. The cost studies and the rates assumed there was one entrance facility for each transport rate. Therefore, the transport rates that were approved effectively included the cost of one entrance facility.

In the cost studies and rates that were accepted in that proceeding, the cost and rates for "entrance facilities" were zero, because those costs, and the rates to recover those costs, were included in the new "transport" charges.

The impacts of the new rates should have been fairly minor. For example, a 15 mile DS1 circuit plus entrance facility had "before" rates that totaled \$139.51 (\$89.42 for the entrance facility plus a \$35.99 fixed transport charge, plus \$0.94 per mile for transport). After Phase II, the transport rate was \$148.97. This would have been an increase of about 7 percent.

L	However when the Phase II rates went into effect, Mountain Telecommunications, Inc.
2	(MTI) provided information that the actual effects of these rates were huge percentage
3	increases, much greater than 7 percent. The staff conducted discovery of MTI and Qwest
1	to determine why the actual impact of the price change was much greater than the impact
5	that was expected. Both the Qwest and MTI responses show that many of those circuits
5	are arranged in ways that do not include an entrance facility.1

I have reviewed those responses and determined that MTI's transport lines are provided in such a way that they were not previously paying entrance facilities charges. The rate impact on such lines was large. In the 15 mile DS1 example previously discussed, the rate would go from \$50.09 (\$35.99 fixed transport charge, plus \$0.94 per mile for transport) to \$148.97, a 200% increase.

By paying the current transport charges, MTI is effectively paying for entrance facilities that they are not using. This is an overcharge to MTI and to similar companies.

17 Q. WHAT IS THE THIRD ISSUE IN THE ORDER?

18 A. The third issue is:

What is the appropriate analog port rate using the HAI model as adopted by the Commission? Included in this issue is the appropriate allocation of switching costs between the port rate and usage rates. The parties agree that reciprocal compensation rates will not be addressed in the expedited hearing.

¹ MTI response to Staff 1-1 and 1-2 and Qwest response to Staff Request 23.

Q. WHAT IS YOUR POSITION ON ISSUE 3?

I agree that the total cost of the switch (as determined by the HAI run) should be recovered in the sum of the port and traffic sensitive rates. Qwest's Compliance Filing dated January 10, 2003 shows two different proposed "port" rates. Qwest proposes a port rate of \$2.44 and AT&T in that Compliance Filing supported the port rate from the Order of \$1.61, which was Staff's proposal.² This problem arises primarily out of an inconsistency in the Order. The Order specifies the port rate should be \$1.61.³ Another portion of the Order specifies that 60% ⁴ of the switching costs should be considered port (and therefore 40% should be considered traffic sensitive).

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A.

The problem is that the \$1.61 port rate was not based upon 60% of the switching costs being allocated to the port (The \$1.61 was based on 30% of the switching being port costs). If both the \$1.61 port rate, and traffic sensitive rates (that are based on 40% of the switch costs as usage)continue to be used, then 100% of the switch costs would not be recovered. This is not a desirable result.

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The switching equipment contains traffic sensitive equipment, and also contains non-traffic sensitive equipment (which is termed the "port"). The non-traffic sensitive equipment (port) includes a "line card". The line card is connected to the loop facilities. The number of line cards required depends on the number of loops, not the level of traffic. Therefore, this cost is considered non-traffic sensitive.

² Earlier in these proceedings AT&T had proposed a port rate of \$1.10

³ Arizona Phase IIA Opinion and Order pg.16

⁴ Arizona Phase IIA Opinion and Order pg. 17

On the other hand, inside the switch there is what is called the switching network (sometimes called the "switching fabric"). This is the equipment that switches calls. This cost is for switching traffic, and is therefore properly considered to be a traffic sensitive cost.

The exact distribution between the traffic sensitive and non-traffic sensitive costs may vary by switch manufacturer, or by other factors. The number of lines served by the switch could also impact the percent that is traffic sensitive versus non-traffic sensitive. However, for all local switches, a part of the costs is traffic sensitive and part is non-traffic sensitive.

If the Commission once again adopts the \$1.61 port rate originally proposed by Staff, then it will be necessary to change the allocation of costs between port and traffic sensitive rates contained in the Order, and increase the usage rates above the levels set in the Order

Alternatively, if the Commission decides to keep the allocation of 60% to port and 40% to traffic sensitive contained in the Order, the existing port rate would have to change to \$2.44. Using the 30 percent port and 70 percent traffic sensitive distribution initially proposed by AT&T, the port rate would be \$1.10. Staff originally proposed that the existing \$1.61 port rate be maintained because it appeared to be a reasonable compromise between what Qwest and the CLECs (\$1.10) were proposing at the time. However, since

- I have not conducted a study to determine what the correct mix is for the switching
 equipment in Arizonia, I will review the evidence presented by the parties on this issue.
- My recommendation at this time is that the sum of the port and usage rates must recover 100% of the switching costs (as determined by the HAI). This means that either the port rate would have to be higher, or the usage rates would have to be higher, than the rates set in the Order.
- 8 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 9 A. Yes.

William Dunkel, Consultant 8625 Farmington Cemetery Road Pleasant Plains, Illinois 62677

Qualifications

The Consultant is a consulting engineer specializing in telecommunication regulatory proceedings. He has participated in over 140 state regulatory proceedings as listed on the attached Relevant Work Experience.

The Consultant has provided cost analysis, rate design, jurisdictional separations, depreciation, expert testimony and other related services to state agencies throughout the country in numerous telecommunication state proceedings. The Consultant has also provided depreciation testimony to state agencies throughout the country in several electric utility proceedings.

The Consultant made a presentation pertaining to Video Dial Tone at the NASUCA 1993 Mid-Year Meeting held in St. Louis.

In addition, the Consultant also made a presentation to the NARUC Subcommittee on Economics and Finance at the NARUC Summer Meetings held in July, 1992. That presentation was entitled "The Reason the Industry Wants to Eliminate Cost Based Regulation--Telecommunications is a Declining Cost Industry."

The Consultant provides services almost exclusively to public agencies, including the Public Utilities Commission, the Public Counsel, or the State Department of Administration in various states.

William Dunkel currently provides, or in the past has provided, services in telecommunications proceedings to the following clients:

The Public Utility Commission or the Staffs in the States of:

Arkansas Mississippi
Arizona Missouri
Delaware New Mexico
Georgia Utah
Guam Virginia
Illinois Washington
Maryland U.S. Virgin Islands

The Office of the Public Advocate, or its equivalent, in the States of:

Colorado Maryland
District of Columbia Missouri
Georgia New Jersey
Hawaii New Mexico
Illinois Ohio

Indiana Pennsylvania

Iowa Utah

Maine Washington

The Department of Administration in the States of:

Illinois South Dakota Minnesota Wisconsin

In April, 1974, the Consultant was employed by the Illinois Commerce Commission in the Electric Section as a Utility Engineer. In November of 1975, he transferred to the Telephone Section of the Illinois Commerce Commission and from that time until July, 1980, he participated in essentially all telephone rate cases and other telephone rate matters that were set for hearing in the State of Illinois. During that period, he testified as an expert witness in numerous rate design cases and tariff filings in the areas of rate design, cost studies and separations. During the period 1975-1980, he was the Separations and Settlements expert for the Staff of the Illinois Commerce Commission.

From July, 1977 until July, 1980, he was a Staff member of the FCC-State Joint Board on Separations, concerning the "Impact of Customer Provision of Terminal Equipment on Jurisdictional Separations" in FCC Docket No. 20981 on behalf of the Illinois Commerce Commission. The FCC-State Joint Board is the national board which specifies the rules for separations in the telephone industry.

The Consultant has taken the AT&T separations school which is normally provided to the AT&T personnel.

The Consultant has taken the General Telephone separations school which is normally provided for training of the General Telephone Company personnel in separations.

Since July, 1980 he has been regularly employed as an independent consultant in telephone rate proceedings across the nation.

He has testified before the Illinois House of Representatives Subcommittee on Communications, as well as participating in numerous other schools and conferences pertaining to the utility industry.

Prior to employment at the Illinois Commerce Commission, the Consultant was a design engineer for Sangamo Electric Company designing electric watt-hour meters used in the electric utility industry. The Consultant was granted patent No. 3822400 for a solid state meter pulse initiator.

The Consultant graduated from the University of Illinois in February, 1970 with a Bachelor's of Science Degree in Engineering Physics with emphasis on economics and other business-related subjects. The Consultant has taken several post-graduate courses since graduation.

RELEVANT WORK EXPERIENCE OF WILLIAM DUNKEL

ARIZONA

- U.S. West Communications

Wholesale cost/UNE case

General rate case
Depreciation case

General rate case

Cost of Service Study

Docket No. T-00000A-00-0194

Docket No. E-1051-93-183 Docket No. T-01051B-97-0689

Docket No. T-01051B-99-0105

ARKANSAS

- Southwestern Bell Telephone Company

Docket No. 83-045-U

CALIFORNIA

(on behalf of the Office of Ratepayer Advocates (ORA))

- Kerman Telephone General Rate Case

A.02-01-004

(on behalf of the California Cable Television Association)

- General Telephone of California

I.87-11-033

- Pacific Bell

Fiber Beyond the Feeder Pre-Approval

Requirement

COLORADO

- Mountain Bell Telephone Company

General Rate Case Docket No. 96A-218T et al. Call Trace Case Docket No. 92S-040T Docket No. 91A-462T Caller ID Case Docket No. 90S-544T General Rate Case Docket No. 1766 Local Calling Area Case General Rate Case Docket No. 1720 Docket No. 1700 General Rate Case Docket No. 1655 General Rate Case Docket No. 1575 General Rate Case Docket No. 1620 Measured Services Case

Independent Telephone Companies

Cost Allocation Methods Case

Docket No. 89R-608T

DELAWARE

- Diamond State Telephone Company

General Rate Case
General Rate Case
Report on Small Centrex

PSC Docket No. 82-32 PSC Docket No. 84-33 PSC Docket No. 85-32T

General Rate Case PSC Docket No. 86-20 PSC Docket No. 86-34 Centrex Cost Proceeding DISTRICT OF COLUMBIA C&P Telephone Company of D.C. Depreciation issues Formal Case No. 926 **FCC** FCC Docket No. 96-45 Review of jurisdictional separations Developing a Unified Intercarrier Compensation Regime CC Docket No. 01-92 **FLORIDA** BellSouth, GTE, and Sprint Fair and reasonable rates **Undocketed Special Project GEORGIA** Southern Bell Telephone & Telegraph Co. General Rate Proceeding Docket No. 3231-U General Rate Proceeding Docket No. 3465-U General Rate Proceeding Docket No. 3286-U General Rate Proceeding Docket No. 3393-U **HAWAII** GTE Hawaiian Telephone Company Depreciation/separations issues Docket No. 94-0298 Docket No. 7702 Resale case **ILLINOIS** Docket No. 02-0560 Verizon North Inc. and Verizon South Inc. **DSL** Waiver Petition Proceeding Geneseo Telephone Company EAS case Docket No. 99-0412 Central Telephone Company Docket No. 78-0595 (Staunton merger) General Telephone & Electronics Co. Usage sensitive service case Docket Nos. 98-0200/98-0537 Docket No. 93-0301 General rate case (on behalf of CUB) (Usage sensitive rates) Docket No. 79-0141 (Data Service) Docket No. 79-0310

(Certificate) (Certificate)

Docket No. 79-0499

Docket No. 79-0500

-	General Telephone Co.	Docket No. 80-0389
-	Ameritech (Illinois Bell Telephone Company)	
Alternative Regulation Review		Docket No. 98-0252
	Area code split case	Docket No. 94-0315
	General Rate Case	Docket No. 83-0005
	(Centrex filing)	Docket No. 84-0111
	General Rate Proceeding	Docket No. 81-0478
	(Call Lamp Indicator)	Docket No. 77-0755
	(Com Key 1434)	Docket No. 77-0756
	(Card dialers)	Docket No. 77-0757
	(Concentration Identifier)	Docket No. 78-0005
	(Voice of the People)	Docket No. 78-0028
	(General rate increase)	Docket No. 78-0034
	(Dimension)	Docket No. 78-0086
	(Customer controlled Centrex)	Docket No. 78-0243
	(TAS)	Docket No. 78-0031
	(Ill. Consolidated Lease)	Docket No. 78-0473
	(EAS Inquiry)	Docket No. 78-0531
	(Dispute with GTE)	Docket No. 78-0576
	(WUI vs. Continental Tel.)	Docket No. 79-0041
	(Carle Clinic)	Docket No. 79-0132
	(Private line rates)	Docket No. 79-0143
	(Toll data)	Docket No. 79-0234
	(Dataphone)	Docket No. 79-0237
	(Com Key 718)	Docket No. 79-0365
	(Complaint - switchboard)	Docket No. 79-0380
	(Porta printer)	Docket No. 79-0381
	(General rate case)	Docket No. 79-0438
	(Certificate)	Docket No. 79-0501
	(General rate case)	Docket No. 80-0010
	(Other minor proceedings)	Docket No. various
_	Home Telephone Company	Docket No. 80-0220
-	Northwestern Telephone Company	
	Local and EAS rates	Docket No. 79-0142
	EAS	Docket No. 79-0519
<u>INDIA</u>	<u>NA</u>	
_	Public Service of Indiana (PSI)	
	Depreciation issues	Cause No. 39584
-	Indianapolis Power and Light Company	
	Depreciation issues	Cause No. 39938

<u>IOWA</u>

	U S West Communications, Inc.	
	Local Exchange Competition	Docket No. RMU-95-5
	Local Network Interconnection	Docket No. RPU-95-10
	General Rate Case	Docket No. RPU-95-11
	General Rate Case	Docket No. Id 6-75-11
KAN	SAS	
-	Southwestern Bell Telephone Company	
	Commission Investigation of the KUSF	Docket No. 98-SWBT-677-GIT
-	Rural Telephone Service Company	
	Audit and General rate proceeding	Docket No. 00-RRLT-083-AUD
	Request for supplemental KUSF	Docket No. 00-RRLT-518-KSF
-	Southern Kansas Telephone Company	
	Audit and General rate proceeding	Docket No. 01-SNKT-544-AUD
-	Pioneer Telephone Company	
	Audit and General rate proceeding	Docket No. 01-PNRT-929-AUD
-	Craw-Kan Telephone Cooperative, Inc.	
	Audit and General rate proceeding	Docket No. 01-CRKT-713-AUD
-	Sunflower Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 01-SFLT-879-AUD
-	Bluestem Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 01-BSST-878-AUD
-	Home Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 02-HOMT-209-AUD
-	Wilson Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 02-WLST-210-AUD
-	S&T Telephone Cooperative Association, Inc.	
	Audit and General rate proceeding	Docket No. 02-S&TT-390-AUD
-	Blue Valley Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 02-BLVT-377-AUD
-	JBN Telephone Company	
	Audit and General rate proceeding	Docket No. 02-JBNT-846-AUD
-	S&A Telephone Company	D 1 137 00 00 10 10 17 100 17 10
	Audit and General rate proceeding	Docket No. 03-S&AT-160-AUD
MAI	NE	
1017711	New England Telephone Company	
_	General rate proceeding	Docket No. 92-130
	General rate proceeding	DOCKOL 110. 72-130
MAR	YLAND	
_	Chesapeake and Potomac Telephone Company	
	General rate proceeding	Docket No. 7851
	Cost Allocation Manual Case	Case No. 8333
	Cost Allocation Issues Case	Case No. 8462

- Verizon Maryland
PICC rate case Case No. 8862
USF case Case No. 8745

MINNESOTA

-	Access charge (all companies)	Docket No. P-321/CI-83-203
_	U. S. West Communications, Inc. (N	Northwestern Bell Telephone Co.)

Centrex/Centron proceeding

Docket No. P-421/91-EM-1002

General rate proceeding
Centrex Dockets
Docket No. P-321/M-80-306
MPUC No. P-421/M-83-466
MPUC No. P-421/M-84-24

MPUC No. P-421/M-84-25 MPUC No. P-421/M-84-26 MPUC No. P-421/GR-80-911

General rate proceeding
General rate proceeding
General rate proceeding
General rate case
MPUC No. P-421/GR-82-203
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- Southwestern Bell

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	OAL No. PUC10506-82		
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- Ohio Bell Telephone Company			
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- BellSouth Telephone Company

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	-	. West Communications	(Modificant Bon Telephone Company)

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